

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	TERRANCE CASSIDY, SR.,  Debtor.	) Case No. 23-21884 CMB ) ) Chapter 13 )
	TERRANCE CASSIDY, SR.,  Movant,	) Docket No. 48 ) Related to Docket No. 47 )
	vs.	) Hearing Date & Time: )
	NO RESPONDENTS.	)

**DEBTOR'S NOTICE To CONVERT CASE FROM CHAPTER 13 To CHAPTER 7**

The Debtor, pursuant to 11 U.S.C. § 1307 (a), hereby elects to convert the above-captioned chapter 13 case to a case under chapter 7 of the Bankruptcy Code. The Debtor is entitled to convert his case because:

1. This Case, filed on September 4, 2023, is a case under chapter 13 of the Bankruptcy Code.
2. The Debtor is eligible to be debtor under chapter 7 of the Bankruptcy Code.

WHEREFORE, the Debtor prays for relief under chapter 7 of the Bankruptcy Code.

Date: 12/14/2023

Respectfully submitted.

/s/ Rodney D. Shepherd  
Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
PA I.D. No. 56914

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**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

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Case No.

**DEBTOR'S MOTION To DISMISS CHAPTER 13 CASE**

The Debtors, pursuant to 11 U.S.C. § 1307(b), hereby elect to dismiss the above-captioned chapter case. The Debtors are entitled to dismiss their case because:

1. This case, filed on [filing date], is a case under chapter 13 of the Bankruptcy Code.
2. This case had not been previously converted under section 706 or 1112 of the Bankruptcy Code.

Date: \_\_\_\_\_

\_\_\_\_\_  
Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: JERRY L. OSBORNE,                    ) Case No. 95-23371 WWB  
  )   
  ) Debtor.                    ) Motion RDS-1  
  )   
  ) Filed under Local Bank. Rule 9013.4,  
  ) Paragraph 6(b)

**DEBTOR'S MOTION To DISMISS CHAPTER 7 CASE**

The Debtor in the above-mentioned case, by his attorney, pursuant to 11 U.S.C. § 707, hereby moves to dismiss his bankruptcy case for the following reasons:

1. A voluntary petition under chapter 7 of the Bankruptcy Code was filed by the Debtor on September 1, 1995.
2. No complaints objecting to discharge or to determine the dischargeability of any debt have been filed in the case.
3. The Debtor has realized that filing a chapter 7 case was a mistake. The purpose of the Chapter 7 filing was to stop the sheriff sales on the two pieces of property that the Debtor owned. hee owned. Debtor was expecting to obtain a second job that would provide him with a suficient amount of income to make the necessary payments on the three mortgages. Upon acquiring the second job the Debtor intended to convert the Bankruptcy to a Chapter 13. Debtor was unable to obtain this second job and one of the two pieces of property was damaged by a fire on or about November 10, 1995. The property that was burned was a rental income property and is no longer bringing in income.
4. There are only three secured creditors and one unsecured creditor is this case. All secured creditors will naturally claim their interest in the properties. No other claims have been filed.
5. The Debtor is willing to compensate the trustee for any expenses incurred herein.

WHEREFORE, the Debtor prays that this bankruptcy case be dismissed without prejudice.

Date: \_\_\_\_\_

\_\_\_\_\_  
Attorney for Debtor



**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Case No.

## DEBTOR'S MOTION To REOPEN CASE

The Debtor, by counsel, requests that the above-captioned case be reopened pursuant to 11 U.S.C. § 350(b) in order to accord relief to the Debtor and in support thereof avers as follows:

1. The Debtor filed bankruptcy pursuant to chapter 7 of the Bankruptcy Code on May 1, 1991 and received a discharge pursuant to 11 U.S.C. § 727 on [date].
2. Among the debts listed in the Debtor's petition and discharged in this bankruptcy case was a debt in the amount of \$555.00 to [name] Hospital.
3. [name] Hospital received notice of the Discharge on or about [date].
4. In [date], the Debtor began receiving calls from [name] Collection Agency which represented that it was collecting the [name] Hospital debt.
5. The Debtor informed [name] Collection Agency of the discharge by telephone and by letter, but nevertheless continued to receive collection calls and letters.
6. The Debtor has prepared an action against [name] Hospital and [name] Collection Agency for contempt for violation of the discharge injunction applicable to this case by virtue of 11 U.S.C. § 524(a). A copy of that action is attached hereto and labeled Exhibit A {omitted}.

WHEREFORE, the Debtor requests that this case be reopened to allow the Debtor to file and prosecute an action against [name] Hospital and [name] Collection Agency for violation of the discharge injunction.

Date: \_\_\_\_\_

Attorney for the Debtor

